

## STATE OF COLORADO

Roy Romer, Governor  
Patti Shwayder, Executive Director

*Dedicated to protecting and improving the health and environment of the people of Colorado*

**HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION**

4300 Cherry Creek Dr. S.  
Denver, Colorado 80222-1530  
Phone (303) 692-3300  
Fax (303) 759-5355

222 S. 6th Street, Room 232  
Grand Junction, Colorado 81501-2768  
Phone (303) 248-7164  
Fax (303) 248-7198



Colorado Department  
of Public Health  
and Environment

July 15, 1997

Gail Hill  
Acting Lead, Regulatory Liaison Group  
Office of Environmental Compliance  
Department of Energy-RFFO  
P.O. Box 928  
Golden CO 80402-0928

**RE: Modification to OU 2 Surface Water IM/IRA (Draft Mound Site Decision Document and Administrative Transfers)**

Dear Ms. Hill:

The Hazardous Materials and Waste Management Division of the Colorado Department of Public Health and Environment supports the modifications to OU 2 Surface Water IM/IRA outlined in your letter of June 30, 1997 (97-DOE-05096). The Division previously provided comments on the Draft Mound Site Plume Decision Document in an attachment to correspondence sent to you July 3, 1997.

The Division agrees with the concepts outlined in the OU2 IM/IRA Administrative Transfers. For final approval of these proposed transfers, specific modifications to the documents involved must be submitted. Once all the elements of the OU2 IM/IRA have been transferred, a proposal to close that document will be considered.

If you have any questions regarding these matters, please contact Carl Spreng at 692-3358.

Sincerely,

Susan Chaki  
Corrective Action Unit Leader  
Federal Facilities Program

cc: Norma Castelfieda, DOE-RFFO  
Jennifer Uhland, Kaiser-Hill  
Tim Rehder, EPA  
Laura Perrault, AGO  
Steve Tarlton, RFPU

JAN 19 1998

ADMIN RECORD

1113-B-00016

000016

Colorado Department of Public Health and Environment  
Hazardous Materials and Waste Management Division

Comments on Revised Draft Mound Site Plume Decision Document - July 28, 1997:

1. Proposed modification to the last sentence of the third paragraph of Section 3.5:  
"From this point, the contaminated groundwater continues to flow northward towards South Walnut Creek; however, it now flows in the colluvium or weathered bedrock."
2. Table 4 should explain that the values listed as background are the background mean plus two standard deviations (M2SD). The background value for plutonium (0.5 pCi/L) was calculated from data in Table D-31 of the *Background Geochemical Characterization Report*. Since this table is labeled "sitewide", it is unclear if this data can truly serve as background. This value is 10-times the background value listed for groundwater and 25-times the background value for surface water. Since background levels are used to dismiss chemicals from being contaminants of concern, a level which is 10-times the stream standard needs further explanation.
3. The fourth paragraph of Section 3.6 should clarify (as the previous paragraph does) that the background levels against which the SW059 plutonium concentrations are measured are background mean plus two standard deviations (M2SD). The reference to Figure 2 should be to Figure 7.
4. The last sentence of the last paragraph of Section 3.6 should be modified:  
"Metals and radionuclides above action levels, but which are not considered contaminants of concern because they are below background levels are asterisked in Tables 3 and 4."
5. It is unclear why the text at the end of the second paragraph of Section 4.1 was changed from "surface water" to "groundwater". Section 4.1.2 (Treatment and Discharge) does not describe the discharge of treated water, and figures 1, 2, 4, 5, and 6 appear to show the water being discharged to South Walnut Creek.
6. The third paragraph in Section 4.1.1 states that work will be halted if "unexpected levels of radioactivity are encountered in the soil." It is unclear how these levels will be determined if "radiological monitoring will not be performed" as stated earlier in the paragraph.

NATURE SAVER™ FAX MEMO 01010		Date	8/12/97	For Pages	1
To	Gary Kleeman		From	Carl Spreng	
Co./Dept.	EPA		Co.		
Phone #			Phone #		
Fax #	312-6067		Fax #		

NATURE SAVER™ FAX MEMO 01010		Date	8/12/97	For Pages	1
To	Annette Primrose		From	Carl Spreng	
Co./Dept.	RMPS		Co.		
Phone #			Phone #		
Fax #	966-5198		Fax #		